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18 Attorneys for Plaintiff and Others Similarly Situated

19
20 **UNITED STATES DISTRICT COURT**
21 **EASTERN DISTRICT OF CALIFORNIA**

22 JOHN CASTORINA, individually and
23 on behalf of all others similarly situated,

24 Plaintiff,

25 vs.

26 BANK OF AMERICA, N.A., and
27 INTEGON NATIONAL INSURANCE
28 COMPANY,

Defendants.

Case No.: 2:21-CV-02004-WBS-KJN

**STIPULATION FOR STAY
OF LITIGATION**

HON. WILLIAM B. SHUBB

1 Plaintiff John Castorina (“Plaintiff”) and Defendant Bank of America, N.A.
2 (“Defendant”) (collectively, the “Parties”), by their undersigned counsel, hereby stipulate and
3 agree as follows:

4 On October 29, 2021, Plaintiff John Castorina filed his Complaint [ECF No. 1].

5 On January 12, 2022, Defendant Bank of America, N.A. filed a Motion to Dismiss [ECF
6
7 No. 15-1].

8 On March 7, 2022, Defendant Integon National Insurance Company filed a Motion to
9 Dismiss [ECF No. 20].

10 On March 21, 2022, Plaintiff John Castorina filed two memorandums in opposition to
11 Defendants’ Motions to Dismiss [ECF Nos. 21, 22].

12 On April 11, 2022, Defendants Bank of America, N.A. and Integon National Insurance
13 Company filed separate memoranda in support of their respective Motions to Dismiss [ECF
14 Nos. 23, 24].

15 On May 6, 2022, this Court issued a Memorandum and Order Granting, in part, and
16 Denying, in part, Defendants’ Motions to Dismiss, and allowing Plaintiff twenty (20) days to
17 file a second amended complaint [ECF No. 27].

18 On May 24, 2022, Plaintiff John Castorina and Defendant Bank of America, N.A.
19 stipulated and agreed to a 21-day extension for Plaintiff to investigate factual issues raised by
20
21 Defendant, and, if applicable, file the Amended Complaint by June 15, 2022 [ECF No. 29].

22 On June 14, 2022, Plaintiff’s counsel has learned that Plaintiff has undergone a
23 significant unforeseen medical emergency and is presently unable to communicate with counsel.

1 On June 14, 2022, the Parties conferred and agreed to a sixty (60) day stay of all
2 deadlines.

3 The Parties agree that this temporary stay will not prejudice either Party.
4

5 Now, therefore, the Parties respectfully request that the Court enter an Order reflecting
6 the stay set forth in this Stipulation.

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12 **ORDER**
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14 **IT IS SO ORDERED:**

15 All deadlines in this pending litigation are hereby stayed for sixty (60) days. The
16 Scheduling Conference is reset for September 26, 2022 at 1:30 p.m. A joint status
17 report shall be filed no later than September 12, 2022.

18
19 Dated: June 15, 2022

20 
21 WILLIAM B. SHUBB
22 UNITED STATES DISTRICT JUDGE
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1
2 Respectfully submitted,

3 Dated: June 15, 2022

s/*David A. Goodwin*

4 Daniel E. Gustafson (#202241)

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22 *Attorneys for Plaintiff*

23 *John Castorina*

1 Dated: June 15, 2022

/s/Danielle Oakley Morris

Danielle Oakley Morris

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13 *Attorneys for Defendant*

14 *Bank of America, N.A.*

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17 **CERTIFICATE OF SERVICE**

18 I HEREBY CERTIFY that a true and correct copy of the foregoing was electronically
19 filed on June 15, 2022, with Clerk of the Court using CM/ECF which caused a copy to be
20 served on all counsel of record.

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22

23 Dated: June 15, 2022

24 By: /s/David A. Goodwin

25 David A. Goodwin